

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FOX VALLEY LABORERS FRINGE	)	
BENEFIT FUNDS, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 07 C 5129
	)	
ZEMON CONCRETE CORPORATION,	)	JUDGE RUBEN CASTILLO
an Illinois corporation,	)	
	)	
PWDBE CONCRETE, INC.,	)	
an Illinois corporation,	)	
	)	
Defendants.	)	

**MOTION FOR ENTRY OF JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment against Defendant, ZEMON CONCRETE CORPORATION, an Illinois corporation, the default of said Defendant having been entered on October 10, 2007 pursuant to Judge Castillo's Order (a copy of the Order entered on October 10, 2007 is attached hereto), in the total amount of \$3,405.20, plus Plaintiffs' costs and reasonable attorneys' fees in the amount of \$865.00.

On September 17, 2007, the Summons and Complaint was served on Defendant, PWDBE CONCRETE, INC., by tendering a copy of said documents to Daniel R. Bronson, Registered Agent, personally, at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant, PWDBE CONCRETE, INC.'s, answer was due on October 8, 2007.

On September 14, 2007, the Summons and Complaint was served on Defendant, ZEMON CONCRETE CORPORATION, by tendering a copy of said documents to the Illinois Secretary of

State because the corporation's registered agent, could not, with reasonable diligence, be found at the registered office of record in Illinois (a copy of the Summons and Affidavit of Compliance for Service on Secretary of State is attached hereto). Therefore, Defendant, ZEMON CONCRETE CORPORATION's, answer was due on October 4, 2007.

Defendant, ZEMON CONCRETE CORPORATION, has failed to timely answer the Complaint, and Plaintiffs respectfully request entry of judgment pursuant to F.R.Civ.P. Rule 55.

/s/ Laura M. Finnegan

Laura M. Finnegan  
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### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 30th day of October 2007:

Mr. William Perlman, Registered Agent  
Zemon Concrete Corporation  
544 W. Colfax, Suite 6  
Palatine, IL 60067

Mr. Daniel R. Bronson, Registered Agent  
PWDBE Concrete, Inc.  
150 N. Wacker Drive, #1400  
Chicago, IL 60606

Illinois Secretary of State  
Department of Business Services  
Attn: File #3517-1321  
Springfield, IL 62756

/s/ Laura M. Finnegan

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